

**IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN
DISTRICT OF PENNSYLVANIA**

**FEDERAL TRADE COMMISSION
and
COMMONWEALTH OF
PENNSYLVANIA**

Plaintiffs,

v.

**THOMAS JEFFERSON UNIVERSITY
and
ALBERT EINSTEIN HEALTHCARE
NETWORK**

Defendants

No. 2:20-cv-01113-GJP

**MOTION TO QUASH OR MODIFY JEFFERSON HEALTH SYSTEM’S
DOCUMENT SUBPOENA AND 30(B)(6) DEPOSITION SUBPOENA
TO NON-PARTY, TANDIGM HEALTH, LLC**

Tandigm Health, LLC (“Tandigm”) is the recipient of a third-party or non-party subpoena in this matter. The subpoena, served by defendant Thomas Jefferson University (“Jefferson”), contains 19 requests for the production of documents, many of which are overbroad, burdensome, harassing, irrelevant or unnecessary (the “Document Subpoena”). (A copy of the Document Subpoena is attached as Exhibit A.) Tandigm seeks to quash or modify the Document Subpoena, in light of the fact that Tandigm is not a party, many of the requests are not relevant to the merger review, and Tandigm should not be put to the expense

and burden of producing information that it does not generate for its business. In the alternative, Tandigm seeks a protective order.

Simultaneously with this motion, Tandigm has served responses and objections to Jefferson's Subpoena. (A copy is attached as Exhibit B.) Jefferson's counsel agreed to several extensions of the time to object to the document requests, while counsel for Tandigm and Jefferson attempted to resolve Tandigm's concerns about the document requests. The last such extension expires on June 4, 2020.

For the reasons set forth in the accompanying memorandum of law, Tandigm respectfully requests that the Court grant Tandigm's motion to quash the Document Subpoena.

Respectfully submitted,

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